

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

Christopher R. Lore	:	Case No. 24-20798-CMB
Laura L. Lore	:	
Debtor(s)	:	Chapter 13
Christopher R. Lore	:	
Laura L. Lore	:	Related to Document No. 21
Movant(s)	:	
	:	Hearing Date: 7/11/24 at 1:30 p.m.
vs.	:	
Midland Mortgage Company and	:	
Ronda J. Winnecur, Trustee	:	
Respondent(s)	:	

TRUSTEE'S RESPONSE TO DEBTORS' MOTION TO REDUCE DEBTORS' CHAPTER 13 PLAN PAYMENTS FOR THE MONTHS OF JUNE THROUGH NOVEMBER 2024

AND NOW, comes Ronda J. Winnecur, Chapter 13 Standing Trustee, and avers the following:

1. Debtors' case was filed on April 4, 2024.
2. Debtors filed a Chapter 13 Plan dated May 1, 2024, which proposes monthly plan payments of \$1,925.00.
3. On June 12, 2024, Debtors filed a Motion to Reduce Debtors' Chapter 13 Plan payments, which requests permission to reduce Debtors' monthly plan payment by the amount of the regular mortgage payment (reducing it to \$667.00 per month) for the months of June through November 2024 because those payments will be made directly by the Pennsylvania Housing Finance Agency.
4. The Trustee does not object to the Motion.
5. However, if the Motion is granted, the Trustee requests that an order be entered that requires the Debtors to file an amended plan or consent order at the end of the forbearance period that expressly increases the plan payment and provides for the resumption of mortgage payments in December 2024. This will ensure

that mortgage payments are timely resumed, and the Trustee can do a recalculation at that time to ensure that the plan is adequately funded on a going forward basis.

WHEREFORE, the Trustee requests that Debtors be required to file an amended Chapter 13 Bankruptcy plan or Consent Order.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 6/25/24

By: /s/ Kate DeSimone
Kate DeSimone
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CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of June 2024, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Office of the U.S. Trustee
1000 Liberty Avenue, Suite 1316
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Denise Carlon
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/s/Rosa M. Richard
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